

PRODUCER ESTABLISHMENT INSPECTION REPORT

Inspection No. 061108184201

Greenleaf, LLC
13960 Palm Road
Neosho, Missouri 64850
EPA Establishment Number: 83893-MO-001

June 11, 2008

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES:

On June 11, 2008 I conducted a For-Cause Producer Establishment Inspection at Greenleaf, LLC of Neosho, Missouri. I presented credentials and Notice of Inspection to Mr. Ralph Kunz, Operations Manager of Greenleaf, LLC. Mr. Kunz is responsible for all of the daily activities of the firm's Neosho pesticide production and distribution facility, as well as for oversight of the business activities of the firm's Pineville, Missouri pesticide production facility. Mr. Kunz's employment with Greenleaf, LLC began on February 18, 2008. Mr. Kunz was the only person interviewed.

This inspection was conducted on referral from the U. S. Environmental Protection Agency (EPA). The inspection was initiated as a follow-up to the January 8 and 9, 2008 For-Cause Producer Establishment Inspection and a subsequent April 22, 2008 For-Cause Marketplace Inspection conducted at Greenleaf, LLC in Neosho.

During the January inspection Greenleaf, LLC was suspected to have produced and distributed unregistered and misbranded pesticides. Evidence was collected in support of the suspected violations and all of the pesticide inventory held or offered for sale and distribution at that time was placed under Federal Stop Sale, Use, Or Removal Order (SSURO). A total of about 42 separate pesticide lots were found to be in violation of FIFRA and placed under SSURO. The April inspection of Greenleaf, LLC at Neosho was scheduled in part to monitor the pesticides placed under SSURO in January, 2008. During the April, 2008 inspection ten pesticides that had been placed under SSURO in January, 2008 were not found.

In subsequent correspondence forwarded to EPA Region 7 and dated May 23, 2008 Greenleaf, LLC, through its Attorneys Wyrsh Hobbs & Mirakean, P.C. of Kansas City, Missouri indicated all of the pesticides placed under the January, 2008 SSURO were found and accounted for. This inspection was conducted to monitor the status of the pesticides placed under the SSURO. I was accompanied and assisted by Mr. Paul Bailey of the Missouri Department of Agriculture and by Mr. Walter Rochelle of EPA.

DISCUSSION WITH MANAGEMENT:

Early discussion concerned the status of the pesticides placed under SSURO. Mr. Kunz affirmed that to the best of his knowledge all of the pesticides placed under SSURO in January, 2008 by EPA had been found and the SSURO inventories were segregated from other pesticide inventories. He stated that the pesticides under SSURO remained stored within the eastern warehouse section of the Greenleaf, LLC main building (Bldg. 1) at the Neosho facility. Mr. Kunz explained that some of the original pesticide containers and bulk bins that had been placed under SSURO had become damaged. He said that in some cases the pesticide containers burst open spilling their contents. According to Mr. Kunz, some individual Gaylord Totes and cardboard box bulk bins were replaced with new containers after the January, 2008 EPA inspection. He stipulated the change in containers made identification of some of the SSURO inventories difficult. Mr. Kunz described some specific instances where pesticides under SSURO were repackaged.

Mr. Kunz stated that a large cardboard box bulk bin of LAWN FUNGUS CONTROL, estimated at 750 pounds was likely repackaged into a new box when the original box was damaged. He said he believed the pallet of 30/30 pound bags of ANT, FLEA & TICK KILLER had collapsed during transfer to another area inside the warehouse and the pallet of bags had to be restacked. Mr. Kunz affirmed that the one gallon jug of 50% WEED CONTROL placed under SSURO was inadvertently crushed between two bulk bins of SSURO pesticides and the liquid herbicide contents spilled out onto other pesticides and the warehouse floor. He said the empty 50% WEED CONTROL container was only found after the April, 2008 EPA inspection. According to Mr. Kunz, a multi-compartment bulk bin of BROADLEAF WEED PREVENTER that had been estimated at 450 pounds was intentionally dumped out on the warehouse floor by Greenleaf, LLC employees to remove and separate the non-pesticidal goods from other compartments of the bin. He explained that the pesticides under SSURO were then scooped up off the floor and shoveled back into two of the bin compartments. Mr. Kunz reported that a bulk bin of ANT, FLEA & TICK KILLER that had been estimated at 700 pounds was covered up by a bulk bin of TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE that had been placed down into the ANT, FLEA & TICK KILLER bulk bin.

Mr. Kunz stated that Greenleaf, LLC will continue to comply with the terms of the EPA SSURO and maintain storage of the pesticides under the SSURO in the firm's Bldg. 1 warehouse.

A discussion was held regarding the firm's recent pesticide business activities. Mr. Kunz reported that since April, 2008 Greenleaf, LLC has sold and distributed Greenleaf, LLC registered re-bagged pesticides. He said the re-bagged or repackaged pesticides were produced under the terms of the EPA approved registration protocols that were described during the April inspection. He also reported that the firm had secured an EPA establishment number for the Pineville facility and pesticide production had continued there. According to Mr. Kunz, Greenleaf, LLC also continued to sell and distribute pesticides that had been received from Wal-Mart, Inc. that were packaged in their original market containers. He said that only those pesticide containers that were full and

unbroken, fully labeled and undamaged were sold to consignees. However, Mr. Kunz indicated that about one week ago Greenleaf, LLC suspended all production and distribution of pesticides, except for the weed and feed type pesticides or the fertilizer and herbicide combination products. Mr. Kunz affirmed that as of June 11, 2008 Greenleaf, LLC held no current inventory of Greenleaf, LLC produced and registered pesticides that were packaged, labeled and released for shipment. He confirmed that unprocessed pesticide inventories packaged in damaged or partial containers stored at Greenleaf, LLC were not held for sale or distribution. According to Mr. Kunz, only the pesticides that are packaged in their original undamaged fully labeled market containers are held for sale and distribution.

INVESTIGATOR'S SUMMARY:

Mr. Kunz indicated that all of the pesticides placed under SSURO during the January, 2008 inspection were still stored in the main Bldg. 1 warehouse at the Neosho facility. Mr. Kunz allowed me to inspect the pesticides held under the January SSURO. I observed that pesticide storage conditions inside Bldg. 1 were substantially improved, since the January and April, 2008 visits. The storage conditions were better organized and trash and debris had been cleaned up and removed. The chaotic pesticide storage conditions observed during the January, 2008 inspection had been solved.

During the initial January, 2008 inspection the following pesticides were placed under Federal SSURO:

Trade Name	EPA Reg. No.	Quantity
ANT, FLEA & TICK KILLER	Unknown	two/2 to 3 pound bags
FERTILIZER WITH WEED CONTROL	83893-1	estimated 50,000 pounds
FIRE ANT & PREVENTER BAIT	89893-6	estimated 20,000 pounds
KILLS DOLARWEED	Unknown	estimated 8 pound bin
YARD GRANULES PREVENTS WEEDS	Unknown	two/estimated 100 lb. bins
GRUB CONTROL II	Unknown	estimated 80 pound bin
GRUB CONTROL I	Unknown	estimated 250 pound bin
FLEA & TICK CARPET POWDER	Unknown	one/2 pound bag
GOPHER BEGONE	Unknown	one/5 pound
BROADLEAF WEED STOPPER	Unknown	three/27 pound pails
ANT, FLEA & TICK KILLER	Unknown	one/30 pound bag
ANT, FLEA & TICK KILLER	Unknown	two/25 pound jugs
ANT, FLEA & TICK KILLER	Unknown	one/21 pound pail
CRABGRASS STOPPER	Unknown	estimated 7 pound bin
TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE	Unknown	estimated 250 pound bin
BROADLEAF WEED PREVENTER	Unknown	estimated 100 pound bin
YARD FUNGUS-CONTROL	Unknown	estimated 300 to 400 lb. bin
FUNGUS BEGONE	Unknown	estimated 200 pound bin

SSURO List Continued:

FERTILIZER WITH MOSS CONTROL	Unknown	estimated 250 to 300 lb. bin
GRUB CONTROL	Unknown	estimated 2,700 pound bin
GRUB CONTROL	Unknown	estimated 3,000 pound bin
ANT, FLEA & TICK KILLER	Unknown	30/30 pound bags
CRABGRASS PREVENTER	Unknown	estimated 2,700 pound bin
ALL PURPOSE INSECT KILLER	Unknown	two bins/estimated 1,900 lbs.
LOW NITRATE WEED & FEED	Unknown	estimated 750 pound bin
CONTROL OF DISEASES LAWN FUNGICIDE	Unknown	estimated 250 pound bin
FALL WEED & FEED	Unknown	estimated 1,500 pound bin
LAWN FUNGUS CONTROL	Unknown	estimated 750 pound bin
WEED PREVENTER GRANULES	Unknown	estimated 650 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 3,000 pound bin
22-2-2 WITH MOSS CONTROL	Unknown	estimated 600 pound bin
BROADLEAF WEED PREVENTER	Unknown	estimated 450 pound bin
5% INSECT DUST	Unknown	estimated 800 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 700 pound bin
SNAIL & SLUG KILLER 1	Unknown	estimated 50 pound bin
SNAIL & SLUG KILLER 2	Unknown	two/estimated 50 pound bins
BUG BAIT	Unknown	estimated 5 pound bin
10% DUST	Unknown	estimated 200 pound drum
50% WEED KILLER	Unknown	one gallon jug
SNAIL & SLUG KILLER	Unknown	four/5 pound bags
5% INSECT DUST	Unknown	eight/5 pound bags & two/10 pound bags
FIRE ANT KILLER	Unknown	estimated 25 pound box

The pesticides held under SSURO were stored near the western side of the eastern warehouse section of Bldg. 1. The SSURO inventory segregated from other inventories and marked with orange colored security tape. The actual SSURO notice form was not posted on any of the pesticides. Mr. Kunz kept the form in a file folder.

During the Greenleaf, LLC inspection in April, 2008 at least ten of the 42 pesticide lots placed under SSURO in January, 2008 were not found. Photos taken during the January inspection were reviewed on a laptop computer, as an aid in identification of the poorly labeled SSURO pesticides. The following is a list of the pesticides placed under SSURO in January that were not found during the April 22, 2008 inspection:

Trade Name	EPA Reg. No.	Quantity
ANT, FLEA & TICK KILLER	Unknown	two/2 to 3 pound bags
FLEA & TICK-CARPET POWDER	Unknown	one/2 pound bag
GOPHER BEGONE	Unknown	one/5 pound
ANT, FLEA & TICK KILLER	Unknown	one/21 pound pail

SSURO Pesticides Continued:

TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE	Unknown	estimated 250 pound bin
FUNGUS BEGONE	Unknown	estimated 200 pound bin
FERTILIZER WITH MOSS CONTROL	Unknown	estimated 250 to 300 lb. bin
ANT, FLEA & TICK KILLER	Unknown	30/30 pound bags
50% WEED KILLER	Unknown	one gallon jug
FIRE ANT KILLER	Unknown	estimated 25 pound box

During the June, 2008 inspection many of the missing pesticides, or at least similar lots of these pesticides were found within the inventory surrounded by the orange security tape. Photographs collected during the January, 2008 inspection were consulted in order to identify many of the SSURO pesticides. The May 23, 2008 submission of information to EPA from Greenleaf, LLC's Attorneys was also consulted. Containers and bulk bins of the following seven pesticides were identified and confirmed present with the other pesticides held under SSURO:

Trade Name	EPA Reg. No.	Quantity
ANT, FLEA & TICK KILLER	Unknown	two/2 to 3 pound bags
FLEA & TICK CARPET POWDER	Unknown	one/2 pound bag
GOPHER BEGONE	Unknown	one/5 pound
ANT, FLEA & TICK KILLER	Unknown	one/21 pound pail
FUNGUS BEGONE	Unknown	estimated 200 pound bin
FERTILIZER WITH MOSS CONTROL	Unknown	estimated 250 to 300 lb. bin
FIRE ANT KILLER	Unknown	estimated 25 pound box

Three of the ten pesticides not identified or found during the April, 2008 inspection remained in doubt. The following pesticides were not definitively identified or confirmed present on June 11, 2008:

Trade Name	EPA Reg. No.	Quantity
TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE	Unknown	estimated 250 pound bin
ANT, FLEA & TICK KILLER	Unknown	30/30 pound bags
50% WEED KILLER	Unknown	one gallon jug

What appeared to be the cardboard box bulk bin of TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE (TRIPLE PLAY) was found collapsed inside and on top of a bulk bin of ANT, FLEA & TICK KILLER. TRIPLE PLAY had been identified under SSURO No. 15 by the firm. The color of the pesticide granules appeared similar to photos collected of TRIPLE PLAY in January, 2008. However, the quantity of the lot visible inside the ANT, FLEA & TICK KILLER bulk bin was not in a condition to

confirm the presence of the pesticide. The ANT, FLEA & TICK KILLER was entirely covered by the collapsed TRIPLE PLAY bin.

The pallet of 30 pound bags of ANT, FLEA & TICK KILLER found with the SSURO pesticides was reported by Mr. Kunz to comprise the pallet of 30/30 pound bags listed on the SSURO. The pesticide had been identified by Greenleaf, LLC under SSURO No. 22. On June 11, 2008 the pallet appeared to hold 31/30 pound bags. Mr. Kunz explained the pallet had collapsed and was restacked. However, the SSURO notice form had been removed from the pallet and identification of this lot as the same lot placed under SSURO in January could not be confirmed.

The one gallon jug of 50% WEED KILLER, identified by the firm under SSURO No. 39 had burst and the herbicide contents escaped. The empty container was found among the other pesticides held under SSURO. The container was split and punctured and heavily stained with a sticky substance. Mr. Kunz stated the container was crushed between bulk bins and spilled out onto other pesticides and the warehouse floor. This pesticide was lost and no longer maintained under the SSURO.

I also observed that several of the pesticides placed under SSURO in January and subsequently identified and confirmed present during the April, 2008 inspection were unable to be confirmed present within the SSURO inventory. The following is a list of the pesticides placed under SSURO in January, 2008 and confirmed present during the April, 2008 inspection that were difficult or impossible to identify during the June, 2008 inspection:

Trade Name	EPA Reg. No.	Quantity
GRUB CONTROL	Unknown	estimated 2,700 pound bin
GRUB CONTROL	Unknown	estimated 3,000 pound bin
LAWN FUNGUS CONTROL	Unknown	estimated 750 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 3,000 pound bin
22-2-2 WITH MOSS CONTROL	Unknown	estimated 600 pound bin
BROADLEAF WEED PREVENTER	Unknown	estimated 450 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 700 pound bin

The estimated 2,700 pound bulk bin of GRUB CONTROL that was identified by Greenleaf, LLC under SSURO No. 20 appeared to hold 100 to 200 pounds less granular material than the bulk bin placed under SSURO in January, 2008. The color, as well as the size and shape of the granules also appeared different.

The estimated 3,000 pound bulk bin of GRUB CONTROL, identified under SSURO No. 21 by the firm had been repackaged. According to Mr. Kunz, the original bin burst and the pesticide was repackaged into three separate bulk bins that were identified with the numbers 21A, 21B and 21C. The total amount of granular pesticide held within the three repackaged bins appeared to exceed the amount of pesticide held within the original bulk bin. I was unable to confirm this pesticide as present.

The estimated 750 pound bulk bin of LAWN FUNGUS CONTROL that was identified by Greenleaf, LLC under SSURO No. 28 was held in a different bulk bin than the pesticide that was placed under SSURO in January, 2008. Additionally, the color and nature of the granules appeared different than photographs taken of the pesticide in January, 2008. Mr. Kunz indicated the original bin burst and the granular pesticide spilled out on the warehouse floor. He said Greenleaf, LLC employees scooped up the pesticide granules into another bulk bin. I was unable to confirm that the same lot of LAWN FUNGUS CONTROL remained under SSURO.

The estimated 3,000 pound bulk bin of ANT, FLEA & TICK KILLER was reported by the firm under SSURO No. 30. The bulk bin of pesticide observed on June 11, 2008 appeared to hold 100 to 200 pounds less granular material than the bin placed under SSURO in January, 2008. I was unable to confirm the presence of this lot.

The estimated 600 pound bulk bin of 22-2-2 WITH MOSS CONTROL, identified by Greenleaf, LLC under SSURO No. 31 appeared to hold less granular material than the bin placed under SSURO in January, 2008. Additionally, the color and nature of the granules appeared different. I was unable to confirm identification of this pesticide.

The estimated 450 pound bulk bin of BROADLEAF WEED PREVENTER placed under SSURO was identified by the firm under SSURO No. 32. The granular material held in the multi-compartment bin reported to be BROADLEAF WEED PREVENTER did not appear to be the same pesticide. Mr. Kunz explained that other compartments of the bin held non-pesticide materials and the entire contents of the bulk bin were dumped out by Greenleaf, LLC employees and the pesticide was scooped up off the warehouse floor and returned to the bin. I was unable to confirm this pesticide remained under SSURO.

The estimated 700 pound wooden bulk bin of ANT, FLEA & TICK KILLER placed under SSURO was identified by Greenleaf, LLC under SSURO No. 34. I was unable to identify this pesticide and confirm its status, because a bulk bin of TRIPLE PLAY pesticide that had been placed inside the bulk bin on top of the ANT, FLEA & TICK KILLER had collapsed. The collapsed bulk bin of TRIPLE PLAY covered up the inventory of ANT, FLEA & TICK KILLER and the pesticide was not visible for inspection.

Mr. Kunz provided explanations, as reported. His comments were recorded in a written statement. Although pesticide storage conditions at Greenleaf, LLC had been vastly improved, inventory control and particularly the handling and maintenance of the pesticides placed under SSURO appeared to be inadequate.

Mr. Kunz stated that there currently were no Greenleaf produced and/or registered pesticides held on inventory at the Neosho facility that were packaged, labeled and released for shipment. Mr. Kunz allowed me to review and collect photographs of sets of documents he indicated were the pesticide production records for both the Neosho and Pineville Greenleaf, LLC facilities. The records dated from April 29, 2008 to May 24, 2008.

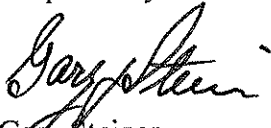
Mr. Kunz allowed me to inspect the three buildings and outside grounds of the Greenleaf, LLC site, including the non-SSURO pesticide inventories stored inside the Bldg. 1 and Bldg. 2. No pesticides were found on the outside grounds and no pesticides were found inside Bldg. 3. Mr. Kunz indicated that most of the pallets and Gaylord Totes of pesticides stored inside Bldg. 1 and 2 were unprocessed and had not yet been checked and sorted by Greenleaf, LLC employees. He said that pallets and Gaylord Totes of unprocessed pesticides are not offered for sale or distribution. Mr. Kunz indicated that no further shipments of pesticides have been received from Wal-Mart, Inc., since April, 2008.

I collected digital photographs and a Receipt For Samples was issued to Mr. Kunz. During the inspection I provided a copy of the EPA publication *U. S. EPA Small Business Resources* to Mr. Kunz. A closing conference was held with Mr. Kunz. The discussion included an explanation of the records required of pesticide producers under FIFRA.

ATTACHMENTS:

Notice of Inspection signed by Mr. Kunz
Statement signed by Mr. Kunz
FTTS Inspection Sheet
Receipt For Samples signed by Mr. Kunz
Digital Photographs
Digital Image Chain of Custody
Digital Image Description Sheet

Respectfully Submitted,



Gary Steiner
Pesticide Investigator
Missouri Department of Agriculture
June 26, 2008



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF INSPECTION

ADDRESS (EPA Regional Office)

Kansas City, Kansas

DATE

6/11/08

HOUR

10:15

A.M.
P.M.

NAME OF INDIVIDUAL

Ralph Kunz

TITLE

Operations Manager

FIRM NAME

Greenleaf, LLC

FIRM ADDRESS (Number, Street, City, State, and ZIP Code)

13960 Palm Road
Neosho, Missouri 64850

SIGNATURE OF EPA EMPLOYEE

[Signature]

TITLE

Investigator

REASON FOR INSPECTION

FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED, LABELED, AND RELEASED FOR SHIPMENT, AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES, IN PLACES WHERE THE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec. 9(a) and 12(a)(2)(B)); AND FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169. (Sec. 8 and 12(a)(2)(B)).

VIOLATION SUSPECTED:

For Cause Producer Establishment Inspection
Monitor Pesticides placed under Stop Sale, Use, or Removal
Order (SSURO) in January, 2008

Section 8, 9(a) and 12(a)(2)(B) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et seq.) are quoted on the reverse of this form.



U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES

ADDRESS (EPA Regional Office)

Kansas City, Kansas

DATE

June 11, 2008

NAME OF INDIVIDUAL

Ralph Kutz

TITLE

Operations Manager

FIRM NAME

Greenloct, LLC

ADDRESS (Street, City, State and Zip Code)

13960 Palau Road

Neosho, Missouri 64850

SAMPLE NUMBERS

061108184201

SAMPLES COLLECTED (Describe fully. List Registration, Lot, Batch, Model, Serial Numbers and other positive identifications.)

The following samples were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9.(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 g). This section is quoted on the reverse of this form.

061108184201 - Digital Photographs

ACKNOWLEDGMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled, and released for shipment.

SIGNATURE (Owner, Operator, or Agent)

Ralph Kutz

TITLE (Owner, Operator or Agent)

Operations Manager

☐ DUPLICATE SAMPLES REQUESTED AND PROVIDED☒ DUPLICATE SAMPLES NOT REQUESTED

SAMPLES WERE

☐ PURCHASED☐ BORROWED

AMOUNT PAID FOR SAMPLES

\$ Nil

☐ CASH☐ VOUCHER☐ TO BE BILLED

NAME OF COLLECTOR (Print or type)

Gary J. Steiner

TITLE OF COLLECTOR

Investigator

SIGNATURE OF COLLECTOR

Gary J. Steiner

STATEMENT

I, Ralph Kunz, under affirmation say:

I am Operations Manager of Greenleaf, LLC in Neosho, Missouri. I am responsible for all the daily activities of the Neosho facility. My Supervisor is Tom Smith, Owner of the firm.

To the best of my knowledge all of the pesticides placed under SSURO by EPA in January, 2002 remain stored within the eastern section of our main warehouse. Some individual Baybord tote boxes were replaced after the January containers were damaged or burst. For instance a large box of Lawn Fungus Control was likely re-boxed when the earlier box was damaged. I believe the pallet of 30 2531/30 pound bags of Ant, Flea Tick Killer collapsed and was re-stacked. The one gallon jug of 50B Weed Killer was inadvertently crushed and spilled out over other pesticides. The empty container was found after April, 2002.

Since April 22, 2002 Greenleaf, LLC has sold and distributed Greenleaf re-bagged pesticides that were produced, according to our EPA approved registration protocols described during the April, 2002 EPA inspection. We have also sold and distributed pesticides that were received from Wal-Mart and still packaged in their original market containers. About one week ago Greenleaf suspended production and distribution of pesticides except for weed feed products. Today Greenleaf, LLC has no inventory of Greenleaf produced pesticides that are packaged, labeled and released for shipment. Unprocessed pesticides in damaged containers are not for sale or distribution. Only the pesticide that remain in their original undamaged fully labeled market containers are held for sale. Greenleaf will continue to comply with the EPA SSURO. I have allowed Gary Steier to review and photograph Greenleaf pesticide production records for Neosho and Pineville, Missouri. I hereby affirm that the above is true to the best of my knowledge.

Signature: Ralph Kunz Title: Operations Manager

Date: June 11, 2002

Firm Name: Greenleaf, LLC

Address: 13960 Palm Road

City: Neosho

State: Missouri Zip Code: 64850

Signature of Witness: Gary Steier